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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

PUGET SOUNDKEEPER ALLIANCE,)	
)	
Plaintiff,)	
v.)	
)	COMPLAINT
CARLILE TRANSPORTATION)	
SYSTEMS, LLC)	
)	
Defendant.)	
)	
_____)	

I. INTRODUCTION

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff, Puget Soundkeeper Alliance (“Soundkeeper”), seek a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for Defendant Carlile Transportation Systems LLC’s (“Carlile’s”) repeated and ongoing violations of effluent standards and limitations under the CWA, as defined at 33 U.S.C. § 1365(f), particularly the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES”) permit

1 authorizing certain stormwater discharges of pollutants from Carlile's Tacoma, Washington
2 facility to navigable waters.

3 II. JURISDICTION AND VENUE

4 2. The Court has subject matter jurisdiction over Soundkeeper's claims under
5 Section 505(a) of the CWA, 33 U.S.C. § 1365(a). Carlile is in violation of an "effluent standard
6 or limitation" as defined by Section 505(f) of the CWA, 33 U.S.C. § 1365(f). Sections 309(d)
7 and 505(a) and (d) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a) and (d), authorize the relief
8 Soundkeeper requests.

9 3. Under Section 505 (b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A),
10 Soundkeeper notified Carlile of Carlile's violations of the CWA and of Soundkeeper's intent to
11 sue under the CWA by letter dated August 5, 2020 and postmarked August 7, 2020 ("Notice
12 Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations
13 in the Notice Letter are incorporated herein by this reference. In accordance with 33 U.S.C. §
14 1365(b)(1)(A) and 40 C.F.R. § 135.2(a)(1), Soundkeeper notified the Administrator of the
15 United States Environmental Protection Agency ("USEPA"), the Administrator of USEPA
16 Region 10, the Director of the Washington Department of Ecology ("Ecology"), and Carlile's
17 registered agent of its intent to sue Carlile by mailing copies of the Notice Letter to these
18 individuals on August 7, 2020.

19 4. At the time of the filing of this Complaint, more than sixty days have passed since
20 the Notice Letter and copies thereof were issued in the manner described in the preceding
21 paragraph.

22 5. The violations complained of in the Notice Letter are continuing and/or are
23 reasonably likely to re-occur.

8 III. PARTIES

9. Soundkeeper is a non-profit corporation organized under the laws of the State of Washington. Soundkeeper is dedicated to protecting and preserving Puget Sound by tracking down and stopping toxic pollution entering its waters. Soundkeeper is a membership organization and has at least one member who is injured by Carlile's violations.

COMPLAINT - 3

1 health interest of Soundkeeper and its members have been, are being, and will be adversely
2 affected by Carlile's violations of the CWA. The relief sought in this lawsuit can redress the
3 injuries to these interests.

4 11. Soundkeeper has organizational standing to bring this action. Soundkeeper has
5 been actively engaged in a variety of educational and advocacy efforts to improve water quality
6 and to address sources of water quality degradation in the waters of Northwest Washington,
7 including the Hylebos Waterway, Commencement Bay, and other parts of Puget Sound. As
8 detailed herein and in the Notice Letter, Carlile has failed to comply with numerous requirements
9 of its NPDES permit including monitoring, recordkeeping, reporting, and planning requirements.
10 As a result, Soundkeeper is deprived of information necessary to properly serve its members by
11 providing information and taking appropriate action to advance its mission. Soundkeeper's
12 efforts to educate and advocate for greater environmental protection, and to ensure the success of
13 environmental restoration projects implemented for the benefit of its members are also
14 obstructed. Finally, Soundkeeper and the public are deprived of information that influences
15 members of the public to become members of Soundkeeper, thereby reducing Soundkeeper's
16 membership numbers. Thus, Soundkeeper's organizational interests have been adversely
17 affected by Carlile's violations. These injuries are fairly traceable to Carlile's violations and are
18 redressable by the Court.

19 12. Carlile is a corporation authorized to conduct business under the laws of the State
20 of Washington.

21 13. Carlile owns and operates a commercial transportation facility located at or about
22 2301 Taylor Way, Tacoma Washington 98421 (referred to herein as the "facility").
23
24

IV. LEGAL BACKGROUND

14. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. A discharge of a pollutant from a point source to waters of the United States without authorization by a NPDES permit, issued under Section 402 of the CWA, 33 U.S.C. § 1342, constitutes a violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and an “effluent standard or limitation” under Section 505(a)(1) and (f) of the CWA, 33 U.S.C. § 1365(a)(1) and (f). Conditions of NPDES permits are “effluent standards or limitations” under Section 505(a)(1) and (f) of the CWA, 33 U.S.C. § 1365(a)(1) and (f). Section 505(a)(1) of the CWA, 33 U.S.C. § 1365(a)(1), authorizes citizen suits against violators of “effluent standards or limitations.”

15. The State of Washington has established a federally approved state NPDES program administered by Ecology. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the USEPA pursuant to section 402(b) of the CWA, 33 U.S.C. § 1342(b).

16. Under Section 402 of the CWA, 33 U.S.C. § 1342, Ecology has repeatedly issued Industrial Stormwater General Permits, most recently on November 20, 2019, effective January 1, 2020, and set to expire December 31, 2024 (the “2020 Permit”). The previous permit was issued December 3, 2014, became effective January 2, 2015, and expired December 31, 2019 (the “2015 Permit”). The 2015 Permit and 2020 Permit (collectively, “the Permits”), contain substantially similar requirements and authorize those that obtain coverage thereunder to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to waters of the United States subject to certain terms and conditions.

has a series of catch basins and stormwater collection pipes and two reported outfalls that discharge stormwater and other pollutants to the Hylebos Waterway.

22. Carlile has violated and continues to violate “effluent standards or limitations,” as defined by 33 U.S.C. § 1365(f), including conditions of the Permits. Carlile’s violations of the Permits are set forth in sections I through VII of the Notice Letter attached hereto as Exhibit 1 and are incorporated herein by this reference. In particular, and among the other violations described in the Notice letter, Carlile has violated the Permits by failing to comply with water quality standards, by failing to implement BMPs to control water quality, by failing to implement corrective actions, by not establishing an adequate stormwater pollution prevention plan, by not collecting quarterly samples, or analyzing quarterly samples once collected, and by not complying with visual monitoring requirements.

23. Carlile discharges stormwater from the facility containing levels of pollutants that exceed the benchmark values established by the Permits, including the days on which Carlile collected samples with the results identified in Tables 1 and 2 below, and likely to continue discharging comparably unacceptable stormwater effluent:

Table 1: Monitoring Point 01A Benchmark Exceedances

Quarter and year in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)	Zinc (Benchmark 117 µg/L)	TSS (Benchmark 30 mg/L)
4th Quarter 2015	61		118	41
2nd Quarter 2016	31			
4th Quarter 2016	57.5		117.5	65.5
1st Quarter 2017	300	35.1	169	110
2nd Quarter 2017	130			170
4th Quarter 2017	234			147

1st Quarter 2018	166			77
4th Quarter 2018	32	32.6	207	
1st Quarter 2019	950	31.9	158	289
2nd Quarter 2019	182	162	392	
3rd Quarter 2019	120	15	145	
4th Quarter 2019	249	14.5		152
1st Quarter 2020	49.8			
2nd Quarter 2020	699	42.9	381	389

Table 2: Monitoring Point 02A Benchmark Exceedances

Quarter and year in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)	Zinc (Benchmark 117 µg/L)	TSS (Benchmark 30 mg/L)
2nd Quarter 2015	31			
4th Quarter 2015	41			
4th Quarter 2016	1100	112	693	1000
1st Quarter 2017	820	50.1	118	400
2nd Quarter 2017	32			52
4th Quarter 2017	268			116
1st Quarter 2018	41			
2nd Quarter 2018	31	28.2	180	50
4th Quarter 2018	68	58.9	129	32
1st Quarter 2019	352	21.6	185	86
2nd Quarter 2019	61	28		
3rd Quarter 2019	263	67.4	170	44
4th Quarter 2019	113	18.2		40
1st Quarter 2020	394	27.8	164	375
2nd Quarter 2020	48	19.5		

24. The General Permit requires Carlile's monitoring to be representative of discharges from the facility. The stormwater samples identified in Tables 1 and 2 are representative of and accurately characterize the quality of stormwater discharges generated by Carlile's facility during the associated calendar quarter. The stormwater monitoring data provided in Tables 1 and 2 shows benchmark exceedances included in the stormwater monitoring results that Carlile submitted to Ecology.

25. Carlile's stormwater discharges are causing or contributing to violations of water quality standards and therefore violate the Permits. Discharges from Carlile's facility contribute the polluted conditions of the waters of the State, including the water quality standards of the Hylebos Waterway. Discharges from Carlile's facility contribute to the ecological impacts that result from the pollution of these waters and to Soundkeeper and its members' injuries resulting therefrom. These requirements and Carlile's violations thereof are described in detail in Section I of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.

26. Carlile's exceedances of the benchmark values and inspection reports by Ecology indicate that Carlile is failing to apply AKART to its discharges and/or is failing to implement an adequate SWPPP and BMPs. Carlile violated and continues to violate the Permits by not developing, modifying, and/or implementing BMPs in accordance with the requirements of the Permits, and/or by not applying AKART to discharges from the facility. These requirements and Carlile's violations thereof are described in detail in Section I.B and Section II¹ of the Notice Letter, attached as Exhibit 1, and incorporated herein by this reference.

¹ The Notice Letter, attached hereto as Exhibit 1, inadvertently includes two sections enumerated "II." This paragraph refers the to the Section II titled "Stormwater Pollution Prevention Plan Violations."

27. Condition S6.C.2 of the 2015 Permit requires permittees who are discharging to a Puget Sound Sediment Cleanup Site to sample and analyze storm drain solids at least once prior to October 1, 2016, and to report all storm drain solids sampling data to Ecology on a Solids Monitoring Report no later than the discharge monitoring report due date for the reporting period in which the solids were sampled. Carlile has violated and continues to violate this Condition because it failed to sample and analyze storm drain solids at least once prior to October 1, 2016 and failed to submit a Solids Monitoring Report to Ecology. These requirements and Carlile's violations thereof are described in section II² of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.

28. Carlile has violated and continues to violate the monitoring requirements of the Permits. For example, the Permits require Carlile to sample its stormwater discharge once during every calendar quarter at each distinct point of discharge offsite except for substantially identical outfalls, yet: Carlile has failed and is failing to monitor discharges from Outfall 002; Carlile failed to collect and analyze stormwater samples at Monitoring Point 01A during the 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018, and Monitoring Point 02A during the 1st quarter of 2015, 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018; Carlile failed to submit timely discharge monitoring reports; and Carlile failed to comply with visual monitoring requirements. The monitoring and inspection requirements and Carlile's violations thereof are described in section

² The Notice Letter, attached as Exhibit 1, inadvertently includes two sections enumerated "II." This paragraph refers to the section titled "Violations of Additional Sampling Requirements for Discharges to Puget Sound Sediment Cleanup Sites."

1 II.1-2³ and section III of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein
 2 by this reference.

3 29. Carlile has not conducted and/or completed the corrective action responses as
 4 required by the Permits. These requirements of the Permits and Carlile's violations thereof are
 5 described in section IV of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein
 6 by this reference.

7 30. Condition S8.B of the Permits require a permittee to undertake a Level 1
 8 corrective action whenever it exceeds a benchmark value identified in Condition S5. A Level 1
 9 corrective action comprises review of the SWPPP to ensure permit compliance, revisions to the
 10 SWPPP to include additional operational source control BMPs with the goal of achieving the
 11 applicable benchmark values in future discharges, signature and certification of the revised
 12 SWPPP, summary of the Level 1 corrective action in the annual report, and full implementation
 13 of the revised SWPPP as soon as possible, but no later than the discharge monitoring report due
 14 date for the quarter the benchmark was exceeded. Condition S8.A of the 2020 Permit requires
 15 that the permittee implement any Level 1 corrective action required by the 2015 Permit.

16 31. Carlile triggered Level 1 corrective action requirements for each benchmark range
 17 exceedance identified in Tables 1 and 2 above. Carlile has violated the requirements of the
 18 Permits described above by failing to conduct a Level 1 corrective action in accordance with
 19 Permit conditions, including the required review, revision, and certification of the SWPPP, the
 20 required implementation of additional BMPs, and the required summarization in the annual
 21 report, each time during the past five years that its quarterly stormwater sampling results were
 22

23 ³ The Notice Letter, attached as Exhibit 1, inadvertently includes two sections enumerated "II." This paragraph
 24 refers to the section titled "Violations of Additional Sampling Requirements for Discharges to Puget Sound
 Sediment Cleanup Sites."

1 greater than a benchmark, including the benchmark excursions listed in Tables 1 and 2 above.
2 These corrective action requirements and Carlile's violations thereof are described in section
3 IV.A of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this
4 reference.

5 32. Condition S8.C of the Permits require a permittee to undertake a Level 2
6 corrective action whenever it exceeds a benchmark value identified in Condition S5 during any
7 two quarters during a calendar year. A Level 2 corrective action comprises review of the
8 SWPPP to ensure permit compliance, revisions to the SWPPP to include additional structural
9 source control BMPs with the goal of achieving the applicable benchmark values in future
10 discharges, signature and certification of the revised SWPPP, summary of the Level 2 corrective
11 action in the annual report, and full implementation of the revised SWPPP as soon as possible,
12 but no later than August 31st of the year following the triggering of the Level 2 corrective action.
13 Condition S8.A of the 2020 Permit requires that the permittee implement any Level 2 corrective
14 action required by the 2015 Permit.

15 33. Carlile triggered Level 2 corrective action requirements for each benchmark
16 exceedance identified in Tables 1 and 2 above that occurred in any two quarters of a calendar
17 year. Carlile has violated the requirements of the Permits described above by failing to conduct a
18 Level 2 corrective action in accordance with Permit conditions, including the required review,
19 revision, and certification of the SWPPP, the required implementation of additional structural
20 source control BMPs, and the required summarization in the annual report, each time during the
21 past five years that its quarterly stormwater sampling results were greater than a benchmark, for
22 any two quarters during a calendar year, including the benchmark excursions listed in Table 1
23 above. These violations include Carlile's failure to fulfill these obligations for turbidity triggered
24

1 by its stormwater sampling during calendar year 2016; for TSS and turbidity triggered by its
 2 stormwater sampling during calendar year 2017; for TSS, turbidity, copper, and zinc triggered by
 3 its stormwater sampling during calendar year 2018; for TSS and turbidity triggered by its
 4 stormwater sampling during calendar year 2019. These corrective action requirements and
 5 Carlile's violations thereof are described in section IV.B of the Notice Letter, attached hereto as
 6 Exhibit 1, and are incorporated herein by this reference.

7 34. Condition S8.D of the Permits require a permittee to undertake a Level 3
 8 corrective action whenever it exceeds a benchmark value identified in Condition S5 during any
 9 three quarters during a calendar year. A Level 3 corrective action comprises review of the
 10 SWPPP to ensure permit compliance, revisions to the SWPPP to include additional treatment
 11 BMPs and operational and/or structural source control BMPs if necessary, with the goal of
 12 achieving the applicable benchmark values in future discharges, signature and certification of the
 13 revised SWPPP, summary of the Level 3 corrective action in the annual report, and full
 14 implementation of the revised SWPPP as soon as possible, but no later than September 30th of
 15 the year following the triggering of the Level 3 corrective action. Condition S8.D also requires
 16 that before implementation of any BMPs that require site-specific design or sizing of structures,
 17 equipment, or processes, that the permittee submit an engineering report, plans, and
 18 specifications, and an operations maintenance manual to Ecology for review, which must be
 19 submitted no later than May 15th prior to the Level 3 corrective action deadline. Condition S8.A
 20 of the 2020 Permit requires that the permittee implement any Level 3 corrective action required
 21 by the 2015 Permit.

22 35. Carlile triggered Level 3 corrective action requirements for each benchmark
 23 exceedance identified in Tables 1 and 2 above that occurred in any three quarters of a calendar
 24

1 year. Carlile has violation the requirements of the Permits described above by failing to conduct
2 a Level 3 corrective action in accordance with Permit conditions, including the required review,
3 revision, and certification of the SWPPP, the required implementation of additional BMPs, the
4 required submission of an engineering report and operations and maintenance manual, and the
5 required summarization in the annual report, each time that its quarterly stormwater sampling
6 results were greater than a benchmark for any three quarters during a calendar year, including the
7 benchmark excursions listed in Tables 1 and 2 above. These violations include Carlile's failure
8 to fulfill these obligations for turbidity triggered by its stormwater sampling in calendar year
9 2014; for TSS and turbidity triggered by its stormwater sampling in calendar year 2017; for TSS
10 triggered by its stormwater sampling in calendar year 2018; and for TSS, turbidity, copper, and
11 zinc, triggered by its stormwater sampling in calendar year 2019. These corrective action
12 requirements and Carlile's violations thereof are described in section IV.C of the Notice Letter,
13 attached hereto as Exhibit 1, and are incorporated herein by this reference.

14 36. Carlile has failed and continues to fail to comply with recording and record
15 keeping requirements of the Permits. These requirements and Carlile's violations thereof are
16 described in section V of the Notice Letter, attached hereto as Exhibit 1, and are incorporated
17 herein by this reference.

18 37. Condition S9.E of the Permits requires Carlile to take certain actions, including
19 reporting to Ecology, in the event Carlile is unable to comply with any terms and conditions of
20 the Permits which may endanger human health or the environment. Carlile has failed to comply
21 with these requirements of the Permits by failing to report and subsequently correct permit
22 violations include each and every time Carlile failed to comply with corrective action
23 requirements as described above in paragraphs 29-35, each and every time Carlile failed to
24

1 sample a stormwater discharge as described above in paragraph 28, and each and every time
2 Carlile discharged stormwater with concentrations of pollutants in excess of the Permit
3 benchmarks as described in paragraphs 22-25 above. These requirements and Carlile's violations
4 thereof are described in section VI of the Notice Letter, attached hereto as Exhibit 1, and
5 incorporated herein by this reference.

6 38. Each of Carlile's violations of the Permits and the CWA are ongoing in that they
7 are currently continuing or are likely to re-occur at least intermittently in the future.

8 39. A significant penalty should be imposed against Carlile pursuant to the penalty
9 factors set forth in 33 U.S.C. § 1319(d).

10 40. Carlile's violations were avoidable had Carlile been diligent in overseeing facility
11 operations and maintenance.

12 41. Carlile has benefited economically as a consequence of its violations and its
13 failure to implement stormwater management improvements at the facility.

14 42. In accordance with Section 505(c)(3) of the CWA, 33 U.S.C. § 1365(c)(3), and 40
15 C.F.R. § 135.4, Soundkeeper is mailing a copy of this Complaint to the Administrator of the
16 EPA, the Regional Administrator for Region 10 of the EPA, and the Attorney General of the
17 United States.

18 VI. CAUSE OF ACTION

19 43. The preceding paragraphs and the allegations in the Notice Letter attached hereto
20 as Exhibit 1 are incorporated herein.

21 44. Carlile's violations of the Permits described herein and in the Notice Letter
22 constitute violations of Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, and
23
24

violations of an “effluent standard or limitation” as defined by Section 505 of the CWA, 33 U.S.C. § 1365(f).

45. These violations committed by Carlile are ongoing or are reasonably likely to continue to occur. Any and all additional violations of the Permits and the CWA which occur after those described in Soundkeeper’s Notice Letter, but before a final decision in this action, should be considered continuing violations subject to this Complaint.

46. Without the imposition of appropriate civil penalties and the issuance of an injunction, Carlile is likely to continue to violate the Permits and the CWA to the further injury of Soundkeeper, its members, and others.

VII. RELIEF REQUESTED

Wherefore, Soundkeeper respectfully requests that this Court grant the following relief:

A. Issue a declaratory judgment that Carlile has violated and continues to be in violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Carlile from operating the facility in a manner that results in further violations of the General Permit and the CWA;

C. Order Carlile to immediately implement a SWPPP that complies with the 2020 Permit;

D. Order Carlile to allow Soundkeeper to participate in the development and implementation of Carlile’s SWPPP;

E. Order Carlile to provide Soundkeeper, for a period beginning on the date of the Court’s Order and running for three years after Carlile achieves compliance with all of the conditions of the Permits, with copies of all reports and other documents which Carlile submits

1 to Ecology regarding Carlile's coverage under the Permits at the facility at the time these
2 documents are submitted to Ecology;

3 F. Order Carlile to take specific actions to remediate the environmental harm caused
4 by its violations;

5 G. Order Carlile to pay civil penalties of \$37,500.00 per day of violation for each
6 violation committed by Carlile through November 2, 2015, and to pay \$55,800 per day of
7 violation for each violation committed by Carlile thereafter, pursuant to Sections 309(d) and
8 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4;

9 H. Award Soundkeeper its litigation expenses, including reasonable attorneys' and
10 expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d), and any
11 other applicable authorization; and

12 I. Award such other relief as this Court deems appropriate.

13
14 RESPECTFULLY SUBMITTED this 22nd day of October, 2020

15
16 By: SMITH & LOWNEY, PLLC
17 /s/ Richard A. Smith
Richard A. Smith WSBA No. 21788
18 By: /s/ Alyssa Englebrecht
Alyssa Englebrecht WSBA No. 46773
19 By: /s/ Savannah Rose
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23
24

Exhibit 1

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

August 5, 2020

Via Certified Mail - Return Receipt Requested

Managing Agent
Carlile Transportation Systems LLC
2301 Taylor Way
Tacoma, WA 98421

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION
PLAN**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance (“Soundkeeper”), 130 Nickerson St. #107, Seattle, WA 98109, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days’ notice of Soundkeeper’s intent to file a citizen suit against Carlile Transportation Systems LLC (“Carlile”), under section 505 of the Clean Water Act (“CWA”), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan (“SWPPP”) required by Carlile’s National Pollution Discharge Elimination System (“NPDES”) permit.

Carlile was granted coverage under the Industrial Stormwater General Permit (“ISGP”) issued by the Washington Department of Ecology (“Ecology”) effective January 2, 2015 and expired on December 31, 2019, under NPDES No. WAR301370 (the “2015 Permit”). Ecology granted Carlile coverage under the current iteration of the ISGP effective January 1, 2020, set to expire on December 31, 2024 (the “2020 Permit”), which maintains the same permit number: WAR301370.

Carlile has violated and continues to violate effluent standards and limitations under the CWA (see 33 U.S.C. § 1365(a) and (f)) including the terms and conditions of the 2015 Permit and the 2020 Permit (collectively, the “Permits”) with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 2301 Taylor Way, Tacoma, WA 98421 (the “facility”) as described herein, to the Hylebos Waterway, part of Commencement Bay and the Puget Sound. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Carlile.

I. COMPLIANCE WITH APPLICABLE STANDARDS.

A. Compliance with Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Carlile's discharges not cause or contribute to an excursion of Washington State water quality standards.

Carlile discharges to the Puget Sound via the Hylebos Waterway and Commencement Bay. Commencement Bay is a Puget Sound Sediment Cleanup Site and does not meet sediment quality standards for 4-methylphenol (p-Cresol), arsenic, bis(2-ethylhexyl)phthalate, cadmium, copper, hexachloro-1,3-butadiene, hexachlorobenzene, lead, mercury, polychlorinated biphenyls (PCBs), polycyclic aromatic hydro carbons (PAHS), tetrachloroethene, and zinc. Carlile discharges stormwater that contains elevated levels of turbidity, copper, zinc, and TSS as indicated in Tables 1 and 2. TSS monitoring is required by Condition S6.C.2.c of the Permits and is a surrogate indicator for these sediment pollutants. *See Fact Sheet*, May 1, 2019, <https://fortress.wa.gov/ecy/ezshare/wq/permits/ISGP-FactSheetFINAL.pdf>. Moreover, the discharges Carlile has sampled and reported underrepresent the polluted condition of its facility discharges, as explained below. These discharges cause and/or contribute to violations of these sediment quality standards as well as water quality standards for turbidity, copper, and zinc in the Hylebos Waterway, Commencement Bay, and the Puget Sound, and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See Toxic Substances*, WAC 173-201A-240 (including criteria for copper, zinc); Natural conditions and other water quality criteria and applications, WAC 173-201A-260 (including toxics and aesthetics criteria); WAC 173-201A-610 and WAC 173-201-612 (use designations for marine waters, including Hylebos Waterway and Commencement Bay); WAC 173-201A-210(l)(d), (l)(e), (l)(a)(iii), (3), (4); WAC 173-204-320(1); WAC 173-201A-240; WAC 173-201A-602; WAC 173-201A-610; WAC 173-201A-612; and WAC 173-204 Part III. Precipitation data from that time period is appended to this Notice of Intent to Sue and identifies these days.

Table 1: Monitoring Point 01A Benchmark Exceedances

Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)	Zinc (Benchmark 117 µg/L)	TSS (Benchmark 30 mg/L)
4th Quarter 2015	61		118	41
2nd Quarter 2016	31			
4th Quarter 2016	57.5		117.5	65.5
1st Quarter 2017	300	35.1	169	110
2nd Quarter 2017	130			170
4th Quarter 2017	234			147
1st Quarter 2018	166			77
4th Quarter 2018	32	32.6	207	
1st Quarter 2019	950	31.9	158	289
2nd Quarter 2019	182	162	392	
3rd Quarter 2019	120	15	145	
4th Quarter 2019	249	14.5		152
1st Quarter 2020	49.8			

Table 2: Monitoring Point 02A Benchmark Exceedances

Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)	Zinc (Benchmark 117 µg/L)	TSS (Benchmark 30 mg/L)
2nd Quarter 2015	31			
4th Quarter 2015	41			
4th Quarter 2016	1100	112	693	1000
1st Quarter 2017	820	50.1	118	400
2nd Quarter 2017	32			52
4th Quarter 2017	268			116
1st Quarter 2018	41			
2nd Quarter 2018	31	28.2	180	50
4th Quarter 2018	68	58.9	129	32
1st Quarter 2019	352	21.6	185	86
2nd Quarter 2019	61	28		
3rd Quarter 2019	263	67.4	170	44
4th Quarter 2019	113	18.2		40
1st Quarter 2020	394	27.8	164	375

B. Compliance with AKART Standards.

Condition S10.C of the Permits requires Carlile to apply all known and reasonable methods of prevention, control, and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate SWPPP and best management practices (“BMPs”). Carlile has violated and continues to violate these conditions by failing to apply

AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1, Table 2, and as described below in this Notice of Intent to Sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Carlile has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

II. VIOLATIONS OF ADDITIONAL SAMPLING REQUIREMENTS FOR DISCHARGES TO PUGET SOUND SEDIMENT CLEANUP SITES

Carlile is in violation of the additional sampling requirements for discharges to Puget Sound Sediment Cleanup Sites as follows:

1. Carlile discharges stormwater to the Hylebos Waterway, part of Inner Commencement Bay. Footnote six of the Permits lists Inner Commencement Bay as a Puget Sound Sediment Cleanup Site. Condition S6.C.2.a of the Permits requires that permittees discharging to a Puget Sound Sediment Cleanup Site sample the discharge for TSS. Carlile's outfall discharges to an area of Commencement Bay that is listed as Category 4(b) for sediment medium. Condition S6.C.2.c of the Permits requires that outfalls that discharge to a Puget Sound Sediment Cleanup sites for categories other than Category 5 must sample for TSS once per quarter and not exceed a benchmark of 30 mg/L. Carlile discharges stormwater that contains elevated levels TSS as indicated above in Tables 1 and Table 2.

2. Carlile has violated Condition S6.C.2.a of the Permits by failing to sample the discharge for TSS at Outfall 001 (Monitoring Point 01A and Monitoring Point 02A) in the 1st quarter of 2015, 2nd quarter of 2015, 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018. Carlile has also violated and continues to violate this Condition by failing to sample the discharge for TSS at Outfall 002, as documented by the Ecology Water Compliance Inspection Report from October 24, 2016, which noted that "[a] search of Ecology's PARIS database indicates that the facility is not conducting the required TSS monitoring or reporting data for Outfall 002."

3. Condition S6.C.2.e of the Permits requires permittees to sample and analyze storm drain solids in accordance with Table 8 of the Permits at least once prior to October 1, 2016. The Ecology Water Compliance Inspection Report from October 24, 2016 noted that Carlile "failed to collect stormwater conveyance system sediment samples by September 30, 2016." Carlile has violated this Condition because it failed to sample and analyze storm drain solids at least once prior to October 1, 2016.

4. Condition S6.C.2.f of the Permits requires that all storm drain solids sampling data shall be reported to Ecology on a Solids Monitoring Report (SMR) no later than the DMR due date for the reporting period in which the solids were sampled. Carlile has violated and continues to violate this Condition because it has not submitted an SMR to Ecology. The

Ecology Water Compliance Inspection Report from October 24, 2016 noted that Carlile has not been reporting the sediment data as required.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

Carlile is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A of the Permits requires Carlile to develop and implement a SWPPP that contains specified components. Condition S3.A.2 of the 2015 Permit and Condition S3.A.1 of the 2020 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. Carlile has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires Carlile to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. Carlile has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented, and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. *See Stormwater Management Manual for Western Washington*, July 2019, <https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/DocsForDownload/2019SWMMWW.pdf>. Carlile's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Carlile's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours, and seasonal variations in business hours or in industrial activities as required.

5. Carlile's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the

stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Carlile's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Carlile's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Carlile's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement mandatory BMPs. Carlile is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

10. Carlile's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs. Carlile fails to include operation source control BMPs in the following categories: good housekeeping (including the definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each

task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Carlile will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit). Some of the BMPs that Carlile is failing to implement include those noted in Permit Non-Compliance Reports, an email from Ecology to a stormwater consultant working for Carlile sent on February 5, 2019, and an Ecology Water Compliance Inspection Report from October 24, 2016, including:

- Failure to vacuum sediment accumulation across the surface of the storage yard, documented by the Permit Non-Compliance Report for the sample collected on October 16, 2019, the Permit Non-Compliance Report for the sample collected on June 8, 2017, and the Permit Non-Compliance Report for the sample collected on March 28, 2017;
- Failure to maintain the settling pond, documented by an email from Ecology to a stormwater consultant working for Carlile sent on February 5, 2019 and the Permit Non-Compliance Report for the sample collected on October 16, 2019 and the Permit Non-Compliance Report for the sample collected on June 8, 2017;
- Failure to maintain the unpaved areas of the storage yard, documented by an email from Ecology to a stormwater consultant working for Carlile sent on February 5, 2019 and the Permit Non-Compliance Report for the sample collected on October 16, 2019; and
- Failure to clean up the mud that has been witnessed on-site by Ecology for years, documented by an email from Ecology to a stormwater consultant working for Carlile sent on February 5, 2019.

11. Carlile's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers or surface waters and ground waters of the state, including failing to prevent solids from entering the stormwater and discharging off-site, as documented by an email from Ecology to a stormwater consultant working for Carlile sent on February 5, 2019 stating that Ecology has "photographed turbidity entering Water of the State from their outfall."

12. Carlile's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff.

13. Carlile's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

14. Carlile's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

15. Carlile's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; and specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Carlile to collect a sample of its stormwater discharge once during every calendar quarter. Carlile violated this requirement by failing to collect stormwater samples for Monitoring Point 01A during the 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018, and by failing to collect stormwater samples for Monitoring Point 02A during the 1st quarter of 2015, 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018.

Condition S4.B.2.c of the 2015 Permit and S4.B.3.a of the 2020 Permit require Carlile to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria but require the collection of a sample even if the criteria cannot be met. The facility has at least two distinct points of discharge off-site: Outfall 001 and Outfall 002. The Ecology Water Compliance Inspection Report from October 24, 2016 noted that Carlile was not sampling from Outfall 002. Carlile has violated these conditions each and every quarter during the last five years that Carlile was and is required to sample its stormwater discharges in which Carlile failed to collect a quarterly sample from Outfall 002. These violations will continue until Carlile commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits and Table 3 of the 2020 Permit requires Carlile to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, and petroleum hydrocarbons. Condition S6.C.2.a of the Permits requires Carlile to analyze stormwater samples collected quarterly for TSS.

Carlile violated these conditions by failing to analyze stormwater samples at Monitoring Point 01A and Monitoring Point 02A as described in Table 3 and Table 4 below:

Table 3: Parameters Not Analyzed for Monitoring Point 01A

Monitoring Period	Parameters Not Analyzed
1st Quarter 2015	TSS
2nd Quarter 2015	TSS
3rd Quarter 2015	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2016	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2017	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2018	TSS, turbidity, pH, oil sheen, copper, zinc

Table 4: Parameters Not Analyzed for Monitoring Point 02A

Monitoring Period	Parameters Not Analyzed
1st Quarter 2015	TSS, turbidity, pH, oil sheen, copper, zinc
2nd Quarter 2015	TSS
3rd Quarter 2015	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2016	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2017	TSS, turbidity, pH, oil sheen, copper, zinc
3rd Quarter 2018	TSS, turbidity, pH, oil sheen, copper, zinc

C. Failure to Correctly and Timely Submit Discharge Monitoring Reports.

Condition S9.A of the 2015 Permit and Condition S9.B of the 2020 Permit require Carlile to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Carlile has violated these conditions by failing to submit a DMR within the time prescribed for Monitoring Point 01A and Monitoring Point 02A for the 4th quarter of 2015, 1st quarter of 2016, 2nd quarter of 2016, 3rd quarter of 2016, 4th quarter of 2016, 1st quarter of 2017, and 2nd quarter of 2018, for Outfall 002 each and every quarter during the last five years.

E. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that a monthly visual inspection be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires each inspection to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of

potential pollutant sources required by the permit are accurate; a verification that the site map in the SWPPP reflects current conditions; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed). Carlile has violated and continues to violate these requirements because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections each and every month, including failing to monitor for oil sheen each and every quarter at Outfall 002; failing to monitor for oil sheen during the 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018 at Monitoring Point 01A; and failing to monitor for oil sheen during the 1st quarter of 2015, 3rd quarter of 2015, 3rd quarter of 2016, 3rd quarter of 2017, and 3rd quarter of 2018 at Monitoring Point 02A.

Condition S7.C of the Permits requires that Carlile record the results of each inspection in an inspection report or checklist that is maintained on-site and documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection; the locations inspected; a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits; a summary report and schedule of implementation of the remedial actions Carlile plans to take if the site inspection indicates that the facility is out of compliance; the name, title, signature and certification of the person conducting the facility inspection; and a certification and signature of the responsible corporate officer or a duly authorized representative. Carlile is in violation of these requirements because, during the last five years, it failed to prepare and maintain the requisite inspection reports or checklists and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements.

Condition S8.B of the Permits requires Carlile take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range. Condition S5.A, Condition S6.C.2.a, Table 2, and Table 7 of the Permits, as well as Condition S5.B and Table 3 of the 2020 Permit establishes the following benchmarks: turbidity 25 NTU; pH 5–9 SU; total copper 14 µg/L; total zinc 117 µg/L; no visible oil sheen; TSS 30 mg/L; and petroleum hydrocarbons 10 mg/L.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires that within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter; or, for parameters other than pH or visible oils sheen, the end of the quarter, whichever is later, Carlile: (1) conduct an inspection to investigate the cause; (2) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (3) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values

in future discharges; (4) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits; and (5) and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Carlile is in violation of the Level One Corrective Action requirements in the Permits. It failed to implement Level One Corrective Action within 14 days of receipt or the end of the quarter for the June 23, 2015 turbidity benchmark exceedance; December 28, 2015 zinc benchmark exceedance; June 2, 2016 turbidity benchmark exceedance; October 13, 2016 copper and zinc benchmark exceedances; March 28, 2017 TSS, turbidity, copper, and zinc benchmark exceedances; January 29, 2018 TSS and turbidity benchmark exceedances; and February 14, 2019 TSS, turbidity, copper, and zinc benchmark exceedances. Carlile's failures to comply with the Level One Corrective Action requirements include the failure to perform the required review, revision and certification of the SWPPP; perform required implementation of additional BMPs; and complete the required summarization in the Annual Report each time since January 1, 2015, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range, including the benchmark exceedances listed in Tables 1 and 2.

B. Violations of the Level Two Requirements.

Condition S8.C of the Permits requires Carlile take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range in any two quarters during a calendar year. The Permits establish the benchmarks applicable to Carlile, which are described in section IV.A of this Notice of Intent to Sue.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Carlile: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges; (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits; and (4) sign, certify, and implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31 of the following year.

Carlile is in violation of the Level Two Corrective Action requirements of the Permits. Carlile's continuing violations of these requirements include, but are not limited to, its failure to perform a Level Two Corrective Action for turbidity when Level Two Corrective Action was triggered in the 4th quarter of 2016 by the August 31, 2017 deadline; failure to perform a Level Two Corrective Action for TSS and turbidity when Level Two Corrective Action was triggered in the 2nd quarter of 2017 by the August 31, 2018 deadline; failure to perform a Level Two Corrective Action for TSS and turbidity when Level Two Corrective Action was triggered in the 2nd quarter of 2018 by the August 31, 2019 deadline; and failure to perform a

Level Two Corrective Action for copper and zinc when Level Two Corrective Action was triggered in the 4th quarter of 2018 by the August 31, 2019 deadline (see Tables 1 and 2). Indeed, Carlile is in violation of the Permits for each instance since January 1, 2015, when quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any two quarters during a calendar year and Carlile failed to conduct and complete a Level Two Corrective Action for discharges from its facility in accordance with Permits' conditions by, inter alia, completing the required review, revision and certification of the SWPPP; performing required implementation of additional BMPs, including additional structural source control BMPs; and completing required summarization in the Annual Report.

C. Violations of the Level Three Requirements

Condition S8.D of the Permits requires Carlile take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for any three quarters during a calendar year. The Permits establish the benchmarks applicable to Carlile, which are described in section IV.A of this Notice of Intent to Sue.

As described by Condition S8.D of the Permits, when Carlile triggers a Level Three Corrective Action, it is required to: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced or if new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits require that a licensed professional engineer, geologist, hydrogeologist, or certified stormwater quality professional must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Carlile submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15th prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits requires Carlile fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

Carlile is in violation of the Level Three Corrective Action requirements of the Permits. Carlile's continuing violations of these requirements include, but are not limited to, its failure to perform a Level Three Corrective Action for turbidity triggered in 2014; the Level Three Corrective Action for TSS and turbidity triggered in 2017; the Level Three Corrective Action for TSS triggered in 2018; and the Level Three Corrective Action for TSS, turbidity, copper, and zinc triggered in 2019 (see Tables 1 and 2 above). Indeed, Carlile is in violation of the Permits for each instance since January 1, 2014, in which quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any three quarters during a calendar year and Carlile failed to conduct and complete a Level Three Corrective Action for discharges from its facility in accordance with Permits' conditions by, inter alia, performing the required review, revision and certification of the SWPPP; complying with the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; completing the required implementation of additional BMPs, including additional treatment BMPs; completing the required submission of an engineering report, plans, specifications, and an operations and maintenance plan; and including the required summarization in the annual report.

V. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B of the Permits requires Carlile record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Carlile collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Carlile could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Carlile is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the 2015 Permit and S9.D of the 2020 Permit require Carlile to retain for a minimum of five years a copy of the current Permit, a copy of Carlile's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Carlile is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VI. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the 2015 Permit and Condition S9.F of the 2020 Permit require Carlile to take certain actions in the event it is unable to comply with any of the terms and

conditions of the Permits which may endanger human health or the environment or exceed any numeric effluent limitation in the permit. In such circumstances, Carlile must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Carlile must immediately notify the appropriate Ecology regional office of the failure to comply. Carlile must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Carlile became aware of the circumstances unless Ecology requests an earlier submission.

Carlile routinely violates these requirements, including each and every time it failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, and each and every time Carlile discharged stormwater with concentrations of pollutants in excess of the Permits benchmarks, as described in Tables 1 and 2 above. All these violations may endanger human health or the environment.

VII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, Soundkeeper hereby requests that Carlile provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Carlile fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

VIII. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Soundkeeper. These violations are ongoing. Soundkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation that occurred through November 2, 2015, and \$55,800 per day for each violation that occurred thereafter. In addition to civil penalties, Soundkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Soundkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Carlile under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

SMITH & LOWNEY, PLLC

By: /s/ Richard A. Smith

Richard Smith

Alyssa Englebrecht

cc: Andrew Wheeler, Administrator, U.S. EPA
Chris Hladick, Region 10 Administrator, U.S. EPA
Laura Watson, Director, Washington Department of Ecology
Registered Agent Solutions, Inc., Registered Agent (3400 Capitol Blvd. SE, Suite 101,
Tumwater, WA, 98501)

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/1/15	0	1/29/15	0	2/26/15	0.37	3/26/15	0
1/2/15	0.06	1/30/15	0	2/27/15	0.72	3/27/15	0.04
1/3/15	0	1/31/15	0	2/28/15	0	3/28/15	0
1/4/15	0.4	2/1/15	0.06	3/1/15	0	3/29/15	0
1/5/15	0.32	2/2/15	0.29	3/2/15	0	3/30/15	0.07
1/6/15	0	2/3/15	0.05	3/3/15	0	3/31/15	0.04
1/7/15	0	2/4/15	0.33	3/4/15	0	4/1/15	0.2
1/8/15	0	2/5/15	1.03	3/5/15	0	4/2/15	0
1/9/15	0.01	2/6/15	0.68	3/6/15	0	4/3/15	0.06
1/10/15	0.23	2/7/15	0.93	3/7/15	0	4/4/15	0
1/11/15	0.06	2/8/15	0.14	3/8/15	0	4/5/15	0
1/12/15	0	2/9/15	0.24	3/9/15	0	4/6/15	0.04
1/13/15	0	2/10/15	0.01	3/10/15	0.03	4/7/15	0.02
1/14/15	0	2/11/15	0	3/11/15	0.1	4/8/15	0
1/15/15	0.38	2/12/15	0.04	3/12/15	0	4/9/15	0
1/16/15	0	2/13/15	0	3/13/15	0.08	4/10/15	0.43
1/17/15	1.03	2/14/15	0.01	3/14/15	0.67	4/11/15	0
1/18/15	0.84	2/15/15	0	3/15/15	2.2	4/12/15	0
1/19/15	0.02	2/16/15	0	3/16/15	0.04	4/13/15	0.55
1/20/15	0	2/17/15	0	3/17/15	0.03	4/14/15	0.13
1/21/15	0	2/18/15	0	3/18/15	0	4/15/15	0
1/22/15	0.03	2/19/15	0.18	3/19/15	0	4/16/15	0
1/23/15	0.23	2/20/15	0.03	3/20/15	0.16	4/17/15	0
1/24/15	0.02	2/21/15	0	3/21/15	0.15	4/18/15	0
1/25/15	0	2/22/15	0	3/22/15	0.04	4/19/15	0
1/26/15	0	2/23/15	0	3/23/15	0.32	4/20/15	0
1/27/15	0.03	2/24/15	0	3/24/15	0.3	4/21/15	0.22
1/28/15	0	2/25/15	0.16	3/25/15	0.2	4/22/15	0

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/23/15	0.12	5/21/15	0	6/18/15	0	7/16/15	0
4/24/15	0.13	5/22/15	0	6/19/15	0.02	7/17/15	0
4/25/15	0.05	5/23/15	0	6/20/15	0	7/18/15	0
4/26/15	0	5/24/15	0	6/21/15	0	7/19/15	0
4/27/15	0.01	5/25/15	0	6/22/15	0	7/20/15	0
4/28/15	0.07	5/26/15	0	6/23/15	0	7/21/15	0
4/29/15	0	5/27/15	0	6/24/15	0	7/22/15	0
4/30/15	0	5/28/15	0	6/25/15	0	7/23/15	0
5/1/15	0	5/29/15	0	6/26/15	0	7/24/15	0.01
5/2/15	0	5/30/15	0	6/27/15	0	7/25/15	0
5/3/15	0	5/31/15	0	6/28/15	0.01	7/26/15	0.08
5/4/15	0	6/1/15	0.18	6/29/15	0	7/27/15	0
5/5/15	0.24	6/2/15	0.02	6/30/15	0	7/28/15	0
5/6/15	0	6/3/15	0	7/1/15	0	7/29/15	0
5/7/15	0	6/4/15	0	7/2/15	0	7/30/15	0
5/8/15	0	6/5/15	0	7/3/15	0	7/31/15	0
5/9/15	0	6/6/15	0	7/4/15	0	8/1/15	0
5/10/15	0	6/7/15	0	7/5/15	0	8/2/15	0
5/11/15	0	6/8/15	0	7/6/15	0	8/3/15	0
5/12/15	0.17	6/9/15	0	7/7/15	0	8/4/15	0
5/13/15	0.16	6/10/15	0	7/8/15	0	8/5/15	0
5/14/15	0.01	6/11/15	0	7/9/15	0	8/6/15	0
5/15/15	0	6/12/15	0	7/10/15	0	8/7/15	0
5/16/15	0	6/13/15	0	7/11/15	0	8/8/15	0
5/17/15	0	6/14/15	0	7/12/15	0	8/9/15	0
5/18/15	0	6/15/15	0	7/13/15	0	8/10/15	0
5/19/15	0	6/16/15	0	7/14/15	0	8/11/15	0
5/20/15	0	6/17/15	0	7/15/15	0	8/12/15	0.3

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/13/15	0	9/10/15	0	10/8/15	0	11/5/15	0.05
8/14/15	1.2	9/11/15	0	10/9/15	0.01	11/6/15	0
8/15/15	0	9/12/15	0	10/10/15	1.13	11/7/15	0.5
8/16/15	0	9/13/15	0.02	10/11/15	0	11/8/15	0.26
8/17/15	0	9/14/15	0	10/12/15	0.18	11/9/15	0.13
8/18/15	0	9/15/15	0	10/13/15	0.05	11/10/15	0.05
8/19/15	0	9/16/15	0.04	10/14/15	0	11/11/15	0.06
8/20/15	0.08	9/17/15	0.07	10/15/15	0	11/12/15	0.39
8/21/15	0	9/18/15	0	10/16/15	0	11/13/15	1.32
8/22/15	0	9/19/15	0	10/17/15	0.01	11/14/15	1.86
8/23/15	0	9/20/15	0.16	10/18/15	0.15	11/15/15	0.88
8/24/15	0	9/21/15	0	10/19/15	0.01	11/16/15	0.08
8/25/15	0	9/22/15	0	10/20/15	0	11/17/15	1.16
8/26/15	0	9/23/15	0	10/21/15	0	11/18/15	0.06
8/27/15	0	9/24/15	0	10/22/15	0	11/19/15	0.08
8/28/15	0.02	9/25/15	0.08	10/23/15	0	11/20/15	0
8/29/15	1.28	9/26/15	0	10/24/15	0	11/21/15	0
8/30/15	0.4	9/27/15	0	10/25/15	0.35	11/22/15	0
8/31/15	0	9/28/15	0	10/26/15	0.27	11/23/15	0.12
9/1/15	0.23	9/29/15	0	10/27/15	0	11/24/15	0.28
9/2/15	0	9/30/15	0	10/28/15	0.13	11/25/15	0
9/3/15	0	10/1/15	0	10/29/15	0.07	11/26/15	0
9/4/15	0	10/2/15	0	10/30/15	0.76	11/27/15	0
9/5/15	0.01	10/3/15	0	10/31/15	1.3	11/28/15	0
9/6/15	0.21	10/4/15	0	11/1/15	1.03	11/29/15	0
9/7/15	0.01	10/5/15	0	11/2/15	0.01	11/30/15	0.02
9/8/15	0	10/6/15	0	11/3/15	0.03	12/1/15	0.48
9/9/15	0	10/7/15	0.39	11/4/15	0	12/2/15	0.1

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/3/15	0.5	12/31/15	0	1/28/16	0.61	2/25/16	0
12/4/15	0.08	1/1/16	0	1/29/16	0.19	2/26/16	0.17
12/5/15	0.62	1/2/16	0	1/30/16	0.05	2/27/16	0.13
12/6/15	0.44	1/3/16	0.02	1/31/16	0	2/28/16	0.82
12/7/15	1.08	1/4/16	0.15	2/1/16	0.01	2/29/16	0.09
12/8/15	2.13	1/5/16	0.11	2/2/16	0.01	3/1/16	0.81
12/9/15	0.53	1/6/16	0	2/3/16	0.53	3/2/16	0.28
12/10/15	0.37	1/7/16	0	2/4/16	0.33	3/3/16	0.03
12/11/15	0.01	1/8/16	0	2/5/16	0.14	3/4/16	0.16
12/12/15	0.63	1/9/16	0	2/6/16	0	3/5/16	0.19
12/13/15	0.05	1/10/16	0	2/7/16	0	3/6/16	0.16
12/14/15	0	1/11/16	0.16	2/8/16	0	3/7/16	0.2
12/15/15	0.06	1/12/16	0.51	2/9/16	0	3/8/16	0.14
12/16/15	0.14	1/13/16	0.75	2/10/16	0.13	3/9/16	0.93
12/17/15	0.86	1/14/16	0	2/11/16	0.48	3/10/16	0.23
12/18/15	0.73	1/15/16	0.05	2/12/16	0.8	3/11/16	0.32
12/19/15	0	1/16/16	0.4	2/13/16	0.49	3/12/16	0.15
12/20/15	0.17	1/17/16	0.33	2/14/16	0.15	3/13/16	0.62
12/21/15	1.08	1/18/16	0.06	2/15/16	0.46	3/14/16	0.25
12/22/15	0.18	1/19/16	0.49	2/16/16	0	3/15/16	0
12/23/15	0.24	1/20/16	0.27	2/17/16	0.47	3/16/16	0
12/24/15	0.1	1/21/16	1.15	2/18/16	0.12	3/17/16	0
12/25/15	0.23	1/22/16	0.26	2/19/16	0.4	3/18/16	0
12/26/15	0	1/23/16	0.77	2/20/16	0	3/19/16	0
12/27/15	0.34	1/24/16	0	2/21/16	0.05	3/20/16	0.17
12/28/15	0.06	1/25/16	0	2/22/16	0.17	3/21/16	0.34
12/29/15	0	1/26/16	0.3	2/23/16	0	3/22/16	0
12/30/15	0	1/27/16	0.82	2/24/16	0.02	3/23/16	0.23

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/24/16	0	4/21/16	0	5/19/16	0.5	6/16/16	0
3/25/16	0	4/22/16	0	5/20/16	0	6/17/16	0.14
3/26/16	0.13	4/23/16	0.01	5/21/16	0.21	6/18/16	0
3/27/16	0.18	4/24/16	0.3	5/22/16	0	6/19/16	0
3/28/16	0	4/25/16	0.11	5/23/16	0	6/20/16	0.55
3/29/16	0	4/26/16	0	5/24/16	0	6/21/16	0
3/30/16	0	4/27/16	0	5/25/16	0	6/22/16	0
3/31/16	0	4/28/16	0	5/26/16	0	6/23/16	0.35
4/1/16	0	4/29/16	0.01	5/27/16	0	6/24/16	0.34
4/2/16	0	4/30/16	0	5/28/16	0.1	6/25/16	0
4/3/16	0.16	5/1/16	0	5/29/16	0	6/26/16	0
4/4/16	0.03	5/2/16	0	5/30/16	0	6/27/16	0
4/5/16	0	5/3/16	0	5/31/16	0	6/28/16	0
4/6/16	0	5/4/16	0	6/1/16	0.04	6/29/16	0
4/7/16	0	5/5/16	0	6/2/16	0.01	6/30/16	0
4/8/16	0	5/6/16	0	6/3/16	0	7/1/16	0
4/9/16	0	5/7/16	0	6/4/16	0	7/2/16	0
4/10/16	0	5/8/16	0.03	6/5/16	0	7/3/16	0
4/11/16	0	5/9/16	0	6/6/16	0	7/4/16	0
4/12/16	0.32	5/10/16	0	6/7/16	0	7/5/16	0
4/13/16	0.1	5/11/16	0	6/8/16	0.01	7/6/16	0.01
4/14/16	0.15	5/12/16	0	6/9/16	0.13	7/7/16	0.12
4/15/16	0	5/13/16	0	6/10/16	0.18	7/8/16	0.24
4/16/16	0	5/14/16	0.02	6/11/16	0	7/9/16	0.01
4/17/16	0	5/15/16	0.02	6/12/16	0	7/10/16	0
4/18/16	0	5/16/16	0.06	6/13/16	0	7/11/16	0
4/19/16	0	5/17/16	0	6/14/16	0.02	7/12/16	0
4/20/16	0	5/18/16	0	6/15/16	0	7/13/16	0

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/14/16	0	8/11/16	0	9/8/16	0.03	10/6/16	0.31
7/15/16	0	8/12/16	0	9/9/16	0	10/7/16	0.11
7/16/16	0	8/13/16	0	9/10/16	0	10/8/16	0.61
7/17/16	0	8/14/16	0	9/11/16	0	10/9/16	0.06
7/18/16	0.01	8/15/16	0	9/12/16	0	10/10/16	0
7/19/16	0	8/16/16	0	9/13/16	0	10/11/16	0
7/20/16	0	8/17/16	0	9/14/16	0	10/12/16	0.01
7/21/16	0	8/18/16	0	9/15/16	0	10/13/16	1.75
7/22/16	0.33	8/19/16	0	9/16/16	0	10/14/16	1.36
7/23/16	0	8/20/16	0	9/17/16	0.22	10/15/16	0.73
7/24/16	0	8/21/16	0	9/18/16	0	10/16/16	0.56
7/25/16	0	8/22/16	0	9/19/16	0.08	10/17/16	0.17
7/26/16	0	8/23/16	0	9/20/16	0	10/18/16	0.08
7/27/16	0	8/24/16	0	9/21/16	0	10/19/16	0.22
7/28/16	0	8/25/16	0	9/22/16	0	10/20/16	1.19
7/29/16	0	8/26/16	0	9/23/16	0.01	10/21/16	0.02
7/30/16	0	8/27/16	0	9/24/16	0	10/22/16	0.05
7/31/16	0	8/28/16	0	9/25/16	0	10/23/16	0.12
8/1/16	0	8/29/16	0	9/26/16	0	10/24/16	0.1
8/2/16	0.13	8/30/16	0	9/27/16	0.02	10/25/16	0
8/3/16	0	8/31/16	0.01	9/28/16	0	10/26/16	1.23
8/4/16	0	9/1/16	0.17	9/29/16	0	10/27/16	0.04
8/5/16	0	9/2/16	0.05	9/30/16	0	10/28/16	0
8/6/16	0	9/3/16	0	10/1/16	0.05	10/29/16	0.19
8/7/16	0.03	9/4/16	0	10/2/16	0	10/30/16	0.26
8/8/16	0	9/5/16	0.01	10/3/16	0	10/31/16	0.66
8/9/16	0	9/6/16	0.42	10/4/16	0.13	11/1/16	0.22
8/10/16	0	9/7/16	0.04	10/5/16	0.04	11/2/16	0.46

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/3/16	0	12/1/16	0.01	12/29/16	0.05	1/26/17	0
11/4/16	0	12/2/16	0.27	12/30/16	0.02	1/27/17	0
11/5/16	1.31	12/3/16	0.18	12/31/16	0.03	1/28/17	0
11/6/16	0.12	12/4/16	0.17	1/1/17	0.43	1/29/17	0.03
11/7/16	0.04	12/5/16	0.24	1/2/17	0	1/30/17	0.02
11/8/16	0	12/6/16	0	1/3/17	0	1/31/17	0
11/9/16	0.24	12/7/16	0	1/4/17	0	2/1/17	0
11/10/16	0	12/8/16	0.06	1/5/17	0	2/2/17	0.01
11/11/16	0	12/9/16	0.34	1/6/17	0	2/3/17	0.7
11/12/16	0.1	12/10/16	0.18	1/7/17	0	2/4/17	0.94
11/13/16	0.24	12/11/16	0.09	1/8/17	0.45	2/5/17	0.82
11/14/16	0.31	12/12/16	0.09	1/9/17	0.05	2/6/17	0.65
11/15/16	1.08	12/13/16	0	1/10/17	0.07	2/7/17	0.01
11/16/16	0.2	12/14/16	0	1/11/17	0	2/8/17	0.7
11/17/16	0	12/15/16	0	1/12/17	0	2/9/17	1.63
11/18/16	0	12/16/16	0	1/13/17	0	2/10/17	0.02
11/19/16	0.04	12/17/16	0	1/14/17	0	2/11/17	0
11/20/16	0.01	12/18/16	0	1/15/17	0	2/12/17	0
11/21/16	0.02	12/19/16	0.81	1/16/17	0	2/13/17	0
11/22/16	0.45	12/20/16	0.01	1/17/17	1.74	2/14/17	0.23
11/23/16	0.13	12/21/16	0	1/18/17	1.21	2/15/17	1.63
11/24/16	0.66	12/22/16	0.3	1/19/17	0.09	2/16/17	0.5
11/25/16	0.01	12/23/16	0.58	1/20/17	0	2/17/17	0.01
11/26/16	0.38	12/24/16	0.1	1/21/17	0.05	2/18/17	0.15
11/27/16	0.32	12/25/16	0	1/22/17	0.08	2/19/17	0.06
11/28/16	0	12/26/16	0.29	1/23/17	0	2/20/17	0.2
11/29/16	0.04	12/27/16	0.05	1/24/17	0	2/21/17	0.07
11/30/16	0.1	12/28/16	0	1/25/17	0	2/22/17	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
2/23/17	0.01	3/23/17	0.26	4/20/17	0.01	5/18/17	0
2/24/17	0	3/24/17	0.24	4/21/17	0	5/19/17	0
2/25/17	0.01	3/25/17	0.01	4/22/17	0.07	5/20/17	0
2/26/17	0.33	3/26/17	0.38	4/23/17	0.49	5/21/17	0
2/27/17	0.16	3/27/17	0.17	4/24/17	0.06	5/22/17	0
2/28/17	0.01	3/28/17	0.14	4/25/17	0.05	5/23/17	0
3/1/17	0.02	3/29/17	0.51	4/26/17	0	5/24/17	0
3/2/17	0.09	3/30/17	0	4/27/17	0.04	5/25/17	0
3/3/17	0.36	3/31/17	0	4/28/17	0	5/26/17	0
3/4/17	0.04	4/1/17	0.04	4/29/17	0.14	5/27/17	0
3/5/17	0	4/2/17	0.04	4/30/17	0.08	5/28/17	0
3/6/17	0	4/3/17	0	5/1/17	0.03	5/29/17	0
3/7/17	0.75	4/4/17	0.12	5/2/17	0.13	5/30/17	0.01
3/8/17	0.13	4/5/17	0.46	5/3/17	0.11	5/31/17	0.11
3/9/17	0.7	4/6/17	0.26	5/4/17	0.44	6/1/17	0.02
3/10/17	0.03	4/7/17	0.1	5/5/17	0.25	6/2/17	0
3/11/17	0.37	4/8/17	0.01	5/6/17	0.02	6/3/17	0
3/12/17	0.02	4/9/17	0	5/7/17	0	6/4/17	0
3/13/17	0.65	4/10/17	0.38	5/8/17	0	6/5/17	0
3/14/17	0.39	4/11/17	0.02	5/9/17	0	6/6/17	0
3/15/17	0.81	4/12/17	0.85	5/10/17	0	6/7/17	0.03
3/16/17	0	4/13/17	0.08	5/11/17	0.47	6/8/17	0.31
3/17/17	0.68	4/14/17	0.01	5/12/17	0.16	6/9/17	0.05
3/18/17	0.34	4/15/17	0	5/13/17	0.03	6/10/17	0
3/19/17	0	4/16/17	0	5/14/17	0.04	6/11/17	0
3/20/17	0.01	4/17/17	0.07	5/15/17	0.33	6/12/17	0
3/21/17	0.2	4/18/17	0.48	5/16/17	0.15	6/13/17	0
3/22/17	0.02	4/19/17	0.35	5/17/17	0	6/14/17	0

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
6/15/17	1.05	7/13/17	0	8/10/17	0	9/7/17	0
6/16/17	0	7/14/17	0	8/11/17	0	9/8/17	0
6/17/17	0.06	7/15/17	0	8/12/17	0.02	9/9/17	0
6/18/17	0	7/16/17	0	8/13/17	0	9/10/17	0
6/19/17	0	7/17/17	0	8/14/17	0	9/11/17	0
6/20/17	0	7/18/17	0	8/15/17	0	9/12/17	0
6/21/17	0	7/19/17	0	8/16/17	0	9/13/17	0
6/22/17	0	7/20/17	0	8/17/17	0	9/14/17	0
6/23/17	0	7/21/17	0	8/18/17	0	9/15/17	0
6/24/17	0	7/22/17	0	8/19/17	0	9/16/17	0
6/25/17	0	7/23/17	0	8/20/17	0	9/17/17	0.15
6/26/17	0	7/24/17	0	8/21/17	0	9/18/17	0.16
6/27/17	0	7/25/17	0	8/22/17	0	9/19/17	0.04
6/28/17	0	7/26/17	0	8/23/17	0	9/20/17	0.13
6/29/17	0	7/27/17	0	8/24/17	0	9/21/17	0.02
6/30/17	0	7/28/17	0	8/25/17	0	9/22/17	0
7/1/17	0	7/29/17	0	8/26/17	0	9/23/17	0
7/2/17	0	7/30/17	0	8/27/17	0	9/24/17	0
7/3/17	0	7/31/17	0	8/28/17	0	9/25/17	0.01
7/4/17	0	8/1/17	0	8/29/17	0	9/26/17	0
7/5/17	0	8/2/17	0	8/30/17	0	9/27/17	0
7/6/17	0	8/3/17	0	8/31/17	0	9/28/17	0
7/7/17	0	8/4/17	0	9/1/17	0	9/29/17	0.07
7/8/17	0	8/5/17	0	9/2/17	0	9/30/17	0.01
7/9/17	0	8/6/17	0	9/3/17	0	10/1/17	0
7/10/17	0	8/7/17	0	9/4/17	0	10/2/17	0
7/11/17	0	8/8/17	0	9/5/17	0	10/3/17	0
7/12/17	0	8/9/17	0	9/6/17	0	10/4/17	0

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
10/5/17	0	11/2/17	0.19	11/30/17	0.27	12/28/17	0.34
10/6/17	0.01	11/3/17	0.3	12/1/17	0.27	12/29/17	1.5
10/7/17	0.01	11/4/17	0.42	12/2/17	0.79	12/30/17	0.11
10/8/17	0.01	11/5/17	0.61	12/3/17	0.05	12/31/17	0
10/9/17	0	11/6/17	0	12/4/17	0	1/1/18	0
10/10/17	0	11/7/17	0	12/5/17	0	1/2/18	0
10/11/17	0.17	11/8/17	0.15	12/6/17	0	1/3/18	0
10/12/17	0.38	11/9/17	0.42	12/7/17	0	1/4/18	0.13
10/13/17	0	11/10/17	0.01	12/8/17	0	1/5/18	0.51
10/14/17	0	11/11/17	0.05	12/9/17	0	1/6/18	0.17
10/15/17	0	11/12/17	0.52	12/10/17	0	1/7/18	0.33
10/16/17	0	11/13/17	0.81	12/11/17	0	1/8/18	0.16
10/17/17	0.06	11/14/17	0.05	12/12/17	0	1/9/18	0.18
10/18/17	1.35	11/15/17	0.46	12/13/17	0	1/10/18	0.17
10/19/17	1.04	11/16/17	0.16	12/14/17	0	1/11/18	1.12
10/20/17	0.13	11/17/17	0	12/15/17	0.06	1/12/18	0.1
10/21/17	1.61	11/18/17	0	12/16/17	0.14	1/13/18	0.01
10/22/17	0.02	11/19/17	0.58	12/17/17	0.03	1/14/18	0
10/23/17	0	11/20/17	0.63	12/18/17	0.7	1/15/18	0.06
10/24/17	0	11/21/17	1.14	12/19/17	1	1/16/18	0.19
10/25/17	0.01	11/22/17	0.52	12/20/17	0.13	1/17/18	0.43
10/26/17	0	11/23/17	0.2	12/21/17	0.01	1/18/18	0.4
10/27/17	0	11/24/17	0.01	12/22/17	0.09	1/19/18	0.03
10/28/17	0	11/25/17	0.19	12/23/17	0	1/20/18	0.08
10/29/17	0	11/26/17	0.25	12/24/17	0.12	1/21/18	0.11
10/30/17	0	11/27/17	0	12/25/17	0.09	1/22/18	0.36
10/31/17	0	11/28/17	0.68	12/26/17	0	1/23/18	0.88
11/1/17	0.01	11/29/17	0	12/27/17	0	1/24/18	0.44

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/25/18	0.15	2/22/18	0	3/22/18	0.46	4/19/18	0
1/26/18	0.41	2/23/18	0.03	3/23/18	0.35	4/20/18	0
1/27/18	0.55	2/24/18	0.06	3/24/18	0.23	4/21/18	0.03
1/28/18	0.06	2/25/18	0.2	3/25/18	0.04	4/22/18	0
1/29/18	1.09	2/26/18	0	3/26/18	0.15	4/23/18	0
1/30/18	0	2/27/18	0.01	3/27/18	0.08	4/24/18	0
1/31/18	0	2/28/18	0.15	3/28/18	0	4/25/18	0
2/1/18	0.57	3/1/18	0.03	3/29/18	0	4/26/18	0
2/2/18	0.08	3/2/18	0.18	3/30/18	0	4/27/18	0.01
2/3/18	0.14	3/3/18	0	3/31/18	0	4/28/18	0.31
2/4/18	0.01	3/4/18	0.13	4/1/18	0	4/29/18	0
2/5/18	0.03	3/5/18	0	4/2/18	0	4/30/18	0
2/6/18	0.05	3/6/18	0	4/3/18	0	5/1/18	0
2/7/18	0	3/7/18	0.04	4/4/18	0.29	5/2/18	0
2/8/18	0.05	3/8/18	0.35	4/5/18	0.21	5/3/18	0
2/9/18	0	3/9/18	0	4/6/18	0.05	5/4/18	0
2/10/18	0	3/10/18	0	4/7/18	0.82	5/5/18	0.01
2/11/18	0	3/11/18	0	4/8/18	0.39	5/6/18	0
2/12/18	0	3/12/18	0	4/9/18	0	5/7/18	0
2/13/18	0.14	3/13/18	0.27	4/10/18	0.18	5/8/18	0.03
2/14/18	0.1	3/14/18	0.03	4/11/18	0.21	5/9/18	0
2/15/18	0.01	3/15/18	0	4/12/18	0.11	5/10/18	0.04
2/16/18	0.11	3/16/18	0	4/13/18	0.66	5/11/18	0
2/17/18	0.3	3/17/18	0	4/14/18	1.7	5/12/18	0
2/18/18	0.06	3/18/18	0	4/15/18	0.12	5/13/18	0
2/19/18	0	3/19/18	0	4/16/18	0.59	5/14/18	0
2/20/18	0	3/20/18	0	4/17/18	0.01	5/15/18	0
2/21/18	0.06	3/21/18	0.1	4/18/18	0	5/16/18	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
5/17/18	0	6/14/18	0	7/12/18	0	8/9/18	0
5/18/18	0	6/15/18	0	7/13/18	0	8/10/18	0
5/19/18	0.04	6/16/18	0	7/14/18	0	8/11/18	0.05
5/20/18	0	6/17/18	0	7/15/18	0	8/12/18	0
5/21/18	0	6/18/18	0	7/16/18	0	8/13/18	0
5/22/18	0	6/19/18	0	7/17/18	0	8/14/18	0
5/23/18	0	6/20/18	0	7/18/18	0	8/15/18	0
5/24/18	0	6/21/18	0	7/19/18	0	8/16/18	0
5/25/18	0	6/22/18	0	7/20/18	0	8/17/18	0
5/26/18	0	6/23/18	0.07	7/21/18	0	8/18/18	0
5/27/18	0	6/24/18	0.13	7/22/18	0	8/19/18	0
5/28/18	0	6/25/18	0	7/23/18	0	8/20/18	0
5/29/18	0	6/26/18	0	7/24/18	0	8/21/18	0
5/30/18	0	6/27/18	0	7/25/18	0	8/22/18	0
5/31/18	0	6/28/18	0	7/26/18	0	8/23/18	0.01
6/1/18	0	6/29/18	0	7/27/18	0	8/24/18	0
6/2/18	0	6/30/18	0	7/28/18	0	8/25/18	0
6/3/18	0.01	7/1/18	0.04	7/29/18	0	8/26/18	0.11
6/4/18	0	7/2/18	0	7/30/18	0	8/27/18	0
6/5/18	0	7/3/18	0	7/31/18	0	8/28/18	0
6/6/18	0	7/4/18	0	8/1/18	0	8/29/18	0
6/7/18	0	7/5/18	0	8/2/18	0.02	8/30/18	0
6/8/18	0.25	7/6/18	0	8/3/18	0.01	8/31/18	0
6/9/18	0.09	7/7/18	0.01	8/4/18	0	9/1/18	0
6/10/18	0.06	7/8/18	0	8/5/18	0	9/2/18	0
6/11/18	0	7/9/18	0	8/6/18	0	9/3/18	0
6/12/18	0	7/10/18	0	8/7/18	0	9/4/18	0
6/13/18	0.02	7/11/18	0	8/8/18	0	9/5/18	0

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
9/6/18	0	10/4/18	0	11/1/18	0.04	11/29/18	0
9/7/18	0.05	10/5/18	0.56	11/2/18	0.3	11/30/18	0.19
9/8/18	0.04	10/6/18	0	11/3/18	0.18	12/1/18	0.07
9/9/18	0.13	10/7/18	0.03	11/4/18	0.03	12/2/18	0.06
9/10/18	0	10/8/18	0.1	11/5/18	0	12/3/18	0
9/11/18	0	10/9/18	0.09	11/6/18	0.05	12/4/18	0
9/12/18	0.01	10/10/18	0	11/7/18	0.04	12/5/18	0
9/13/18	0	10/11/18	0	11/8/18	0	12/6/18	0
9/14/18	0.42	10/12/18	0	11/9/18	0.07	12/7/18	0
9/15/18	0.01	10/13/18	0	11/10/18	0	12/8/18	0
9/16/18	0.17	10/14/18	0	11/11/18	0	12/9/18	0.59
9/17/18	0	10/15/18	0	11/12/18	0	12/10/18	0.09
9/18/18	0	10/16/18	0	11/13/18	0	12/11/18	0.73
9/19/18	0.03	10/17/18	0	11/14/18	0.11	12/12/18	0.07
9/20/18	0.05	10/18/18	0	11/15/18	0.02	12/13/18	0.29
9/21/18	0.02	10/19/18	0	11/16/18	0.03	12/14/18	0.01
9/22/18	0.05	10/20/18	0	11/17/18	0	12/15/18	0.06
9/23/18	0	10/21/18	0	11/18/18	0	12/16/18	0.33
9/24/18	0	10/22/18	0	11/19/18	0	12/17/18	0.45
9/25/18	0	10/23/18	0.06	11/20/18	0	12/18/18	0.7
9/26/18	0	10/24/18	0	11/21/18	0.11	12/19/18	0.11
9/27/18	0	10/25/18	0.66	11/22/18	0.48	12/20/18	0.27
9/28/18	0	10/26/18	0.45	11/23/18	0.34	12/21/18	0
9/29/18	0.03	10/27/18	0.84	11/24/18	0	12/22/18	0.3
9/30/18	0.03	10/28/18	0.61	11/25/18	0.01	12/23/18	0.72
10/1/18	0.3	10/29/18	0.02	11/26/18	1.42	12/24/18	0
10/2/18	0.01	10/30/18	0.03	11/27/18	1.84	12/25/18	0.02
10/3/18	0	10/31/18	0.02	11/28/18	0.16	12/26/18	0.14

Precipitation data for Seattle Tacoma Airport, WA US Station, WA USW00024233

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/27/18	0.01	1/24/19	0.09	2/21/19	0	3/21/19	0
12/28/18	0.43	1/25/19	0	2/22/19	0.11	3/22/19	0.01
12/29/18	0.63	1/26/19	0	2/23/19	0.05	3/23/19	0
12/30/18	0	1/27/19	0	2/24/19	0.01	3/24/19	0
12/31/18	0	1/28/19	0	2/25/19	0	3/25/19	0.16
1/1/19	0	1/29/19	0	2/26/19	0	3/26/19	0.04
1/2/19	0.04	1/30/19	0	2/27/19	0	3/27/19	0
1/3/19	0.78	1/31/19	0.01	2/28/19	0	3/28/19	0
1/4/19	0.08	2/1/19	0.68	3/1/19	0	3/29/19	0
1/5/19	0.04	2/2/19	0.03	3/2/19	0	3/30/19	0
1/6/19	0.4	2/3/19	0.09	3/3/19	0	3/31/19	0
1/7/19	0	2/4/19	0.13	3/4/19	0	4/1/19	0
1/8/19	0.15	2/5/19	0	3/5/19	0	4/2/19	0
1/9/19	0.2	2/6/19	0	3/6/19	0.12	4/3/19	0.03
1/10/19	0.26	2/7/19	0	3/7/19	0.21	4/4/19	0.06
1/11/19	0	2/8/19	0.46	3/8/19	0.06	4/5/19	0.32
1/12/19	0	2/9/19	0.16	3/9/19	0	4/6/19	0.26
1/13/19	0	2/10/19	0.16	3/10/19	0	4/7/19	0.28
1/14/19	0	2/11/19	1.22	3/11/19	0.28	4/8/19	0.05
1/15/19	0	2/12/19	0.86	3/12/19	0.49	4/9/19	0.33
1/16/19	0	2/13/19	0.02	3/13/19	0	4/10/19	0.28
1/17/19	0.05	2/14/19	0.12	3/14/19	0	4/11/19	0.4
1/18/19	0.41	2/15/19	0	3/15/19	0	4/12/19	0.65
1/19/19	0.1	2/16/19	0.15	3/16/19	0	4/13/19	0.09
1/20/19	0	2/17/19	0	3/17/19	0	4/14/19	0.01
1/21/19	0	2/18/19	0.05	3/18/19	0	4/15/19	0
1/22/19	0.85	2/19/19	0.13	3/19/19	0	4/16/19	0.21
1/23/19	0.37	2/20/19	0.19	3/20/19	0	4/17/19	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/18/19	0.13	5/16/19	0.13	6/13/19	0	7/11/19	0
4/19/19	0.16	5/17/19	0.05	6/14/19	0	7/12/19	0
4/20/19	0	5/18/19	0	6/15/19	0	7/13/19	0
4/21/19	0	5/19/19	0	6/16/19	0	7/14/19	0
4/22/19	0.13	5/20/19	0.05	6/17/19	0	7/15/19	0.02
4/23/19	0	5/21/19	0.02	6/18/19	0.21	7/16/19	0
4/24/19	0	5/22/19	0	6/19/19	0.08	7/17/19	0.13
4/25/19	0	5/23/19	0	6/20/19	0.41	7/18/19	0.2
4/26/19	0	5/24/19	0	6/21/19	0	7/19/19	0.03
4/27/19	0.14	5/25/19	0.19	6/22/19	0	7/20/19	0
4/28/19	0	5/26/19	0	6/23/19	0	7/21/19	0
4/29/19	0	5/27/19	0	6/24/19	0	7/22/19	0
4/30/19	0	5/28/19	0	6/25/19	0	7/23/19	0
5/1/19	0	5/29/19	0	6/26/19	0.01	7/24/19	0
5/2/19	0	5/30/19	0	6/27/19	0.08	7/25/19	0
5/3/19	0	5/31/19	0	6/28/19	0	7/26/19	0
5/4/19	0	6/1/19	0	6/29/19	0	7/27/19	0
5/5/19	0	6/2/19	0	6/30/19	0	7/28/19	0
5/6/19	0	6/3/19	0	7/1/19	0	7/29/19	0
5/7/19	0	6/4/19	0	7/2/19	0.43	7/30/19	0
5/8/19	0	6/5/19	0	7/3/19	0	7/31/19	0
5/9/19	0	6/6/19	0.01	7/4/19	0	8/1/19	0
5/10/19	0	6/7/19	0.1	7/5/19	0	8/2/19	0.37
5/11/19	0	6/8/19	0	7/6/19	0	8/3/19	0
5/12/19	0	6/9/19	0	7/7/19	0	8/4/19	0
5/13/19	0	6/10/19	0	7/8/19	0	8/5/19	0
5/14/19	0.16	6/11/19	0	7/9/19	0.17	8/6/19	0
5/15/19	0.02	6/12/19	0	7/10/19	0.17	8/7/19	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/8/19	0	9/5/19	0	10/3/19	0.02	10/31/19	0
8/9/19	0	9/6/19	0	10/4/19	0.03	11/1/19	0
8/10/19	0.38	9/7/19	0.59	10/5/19	0	11/2/19	0
8/11/19	0	9/8/19	0.04	10/6/19	0	11/3/19	0
8/12/19	0	9/9/19	0.29	10/7/19	0.05	11/4/19	0
8/13/19	0	9/10/19	0	10/8/19	0.17	11/5/19	0
8/14/19	0	9/11/19	0	10/9/19	0	11/6/19	0
8/15/19	0	9/12/19	0.24	10/10/19	0	11/7/19	0
8/16/19	0	9/13/19	0	10/11/19	0	11/8/19	0
8/17/19	0	9/14/19	0.05	10/12/19	0	11/9/19	0.32
8/18/19	0	9/15/19	0.44	10/13/19	0	11/10/19	0
8/19/19	0	9/16/19	0.09	10/14/19	0	11/11/19	0
8/20/19	0	9/17/19	0.65	10/15/19	0	11/12/19	0.25
8/21/19	0.3	9/18/19	0.1	10/16/19	0.51	11/13/19	0
8/22/19	0.08	9/19/19	0.04	10/17/19	0.15	11/14/19	0
8/23/19	0	9/20/19	0	10/18/19	0.82	11/15/19	0.19
8/24/19	0	9/21/19	0	10/19/19	0.96	11/16/19	0.01
8/25/19	0	9/22/19	0.24	10/20/19	0.13	11/17/19	0.09
8/26/19	0	9/23/19	0.12	10/21/19	0.39	11/18/19	0.26
8/27/19	0	9/24/19	0	10/22/19	0.1	11/19/19	0.39
8/28/19	0	9/25/19	0	10/23/19	0	11/20/19	0
8/29/19	0.07	9/26/19	0.16	10/24/19	0	11/21/19	0
8/30/19	0	9/27/19	0.14	10/25/19	0.34	11/22/19	0
8/31/19	0	9/28/19	0.04	10/26/19	0	11/23/19	0
9/1/19	0	9/29/19	0.09	10/27/19	0	11/24/19	0.11
9/2/19	0	9/30/19	0	10/28/19	0	11/25/19	0.09
9/3/19	0	10/1/19	0	10/29/19	0	11/26/19	0
9/4/19	0	10/2/19	0	10/30/19	0	11/27/19	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/28/19	0	12/26/19	0.05	1/23/20	0.99	2/20/20	0
11/29/19	0	12/27/19	0.01	1/24/20	0.47	2/21/20	0
11/30/19	0	12/28/19	0	1/25/20	0.16	2/22/20	0.07
12/1/19	0.02	12/29/19	0.01	1/26/20	0.35	2/23/20	0.18
12/2/19	0	12/30/19	0.04	1/27/20	0.61	2/24/20	0
12/3/19	0	12/31/19	0.26	1/28/20	0.67	2/25/20	0
12/4/19	0.03	1/1/20	0	1/29/20	0.37	2/26/20	0.05
12/5/19	0	1/2/20	0.21	1/30/20	0.41	2/27/20	0
12/6/19	0	1/3/20	0.39	1/31/20	0.78	2/28/20	0.09
12/7/19	0.29	1/4/20	0.1	2/1/20	1.18	2/29/20	0.12
12/8/19	0.03	1/5/20	0.14	2/2/20	0	3/1/20	0
12/9/19	0	1/6/20	1.19	2/3/20	0.11	3/2/20	0.01
12/10/19	0.13	1/7/20	0.28	2/4/20	0.11	3/3/20	0.18
12/11/19	0.54	1/8/20	0.04	2/5/20	0.52	3/4/20	0
12/12/19	0.23	1/9/20	0.06	2/6/20	0.83	3/5/20	0.23
12/13/19	0	1/10/20	0.5	2/7/20	0.43	3/6/20	0.48
12/14/19	0.08	1/11/20	0.09	2/8/20	0.04	3/7/20	0.04
12/15/19	0.11	1/12/20	0.18	2/9/20	0	3/8/20	0
12/16/19	0	1/13/20	0.09	2/10/20	0	3/9/20	0
12/17/19	0	1/14/20	0.01	2/11/20	0.01	3/10/20	0
12/18/19	0.3	1/15/20	0.01	2/12/20	0.07	3/11/20	0.07
12/19/19	1.32	1/16/20	0	2/13/20	0.02	3/12/20	0
12/20/19	3.25	1/17/20	0.02	2/14/20	0.11	3/13/20	0.38
12/21/19	0.83	1/18/20	0.34	2/15/20	0.11	3/14/20	0
12/22/19	0.14	1/19/20	0.03	2/16/20	0	3/15/20	0
12/23/19	0.29	1/20/20	0	2/17/20	0	3/16/20	0
12/24/19	0	1/21/20	0.52	2/18/20	0	3/17/20	0
12/25/19	0	1/22/20	0.22	2/19/20	0	3/18/20	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/19/20	0	4/16/20	0	5/14/20	0.11	6/11/20	0.12
3/20/20	0	4/17/20	0	5/15/20	0	6/12/20	0.27
3/21/20	0	4/18/20	0.05	5/16/20	0.54	6/13/20	0.11
3/22/20	0	4/19/20	0	5/17/20	0.13	6/14/20	0
3/23/20	0.1	4/20/20	0	5/18/20	0	6/15/20	0.18
3/24/20	0.04	4/21/20	0	5/19/20	0	6/16/20	0.01
3/25/20	0.18	4/22/20	0.5	5/20/20	0.03	6/17/20	0
3/26/20	0	4/23/20	0.3	5/21/20	0.36	6/18/20	0
3/27/20	0.02	4/24/20	0	5/22/20	0.05	6/19/20	0
3/28/20	0.32	4/25/20	0.59	5/23/20	0	6/20/20	0.03
3/29/20	0.58	4/26/20	0.12	5/24/20	0	6/21/20	0
3/30/20	0.51	4/27/20	0.09	5/25/20	0.11	6/22/20	0
3/31/20	0.03	4/28/20	0	5/26/20	0	6/23/20	0
4/1/20	0.01	4/29/20	0.04	5/27/20	0	6/24/20	0
4/2/20	0	4/30/20	0	5/28/20	0	6/25/20	0
4/3/20	0	5/1/20	0	5/29/20	0	6/26/20	0
4/4/20	0	5/2/20	0.24	5/30/20	1.14	6/27/20	0.56
4/5/20	0	5/3/20	0.06	5/31/20	0.18	6/28/20	0.34
4/6/20	0	5/4/20	0	6/1/20	0	6/29/20	0
4/7/20	0	5/5/20	0	6/2/20	0	6/30/20	0.13
4/8/20	0	5/6/20	0.11	6/3/20	0	7/1/20	0.01
4/9/20	0	5/7/20	0	6/4/20	0	7/2/20	0
4/10/20	0	5/8/20	0	6/5/20	0	7/3/20	0
4/11/20	0	5/9/20	0	6/6/20	0.01	7/4/20	0
4/12/20	0	5/10/20	0	6/7/20	0.02	7/5/20	0
4/13/20	0	5/11/20	0.01	6/8/20	0.03	7/6/20	0
4/14/20	0	5/12/20	0.05	6/9/20	0.45	7/7/20	0
4/15/20	0	5/13/20	0	6/10/20	0.02	7/8/20	0

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Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/9/20	0.01						
7/10/20	0						
7/11/20	0						
7/12/20	0						
7/13/20	0						
7/14/20	0						
7/15/20	0						
7/16/20	0						
7/17/20	0.13						
7/18/20	0						
7/19/20	0						
7/20/20	0						
7/21/20	0						
7/22/20	0.02						
7/23/20	0						
7/24/20	0						
7/25/20	0						
7/26/20	0						
7/27/20	0						
7/28/20	0						
7/29/20	0						
7/30/20	0						
7/31/20	0						
8/1/20	0						